

From: [Knittel, Janette](#)
To: [Valdez, Heather](#)
Subject: FW: Response to comments for ORU-2/tanks permit modification
Date: Thursday, July 05, 2018 8:32:13 AM
Attachments: CWMNW RCRA Part B Page II-13.docx

Heather, Rich's answers to my questions below, and permit condition attached.

-Janette

From: DUVAL Rich [<mailto:Rich.DUVAL@state.or.us>]
Sent: Tuesday, July 03, 2018 3:35 PM
To: Knittel, Janette <Knittel.Janette@epa.gov>
Subject: RE: Response to comments for ORU-2/tanks permit modification

Here you go.

From: Knittel, Janette [<mailto:Knittel.Janette@epa.gov>]
Sent: Tuesday, July 03, 2018 11:54 AM
To: DUVAL Rich
Cc: Valdez, Heather
Subject: RE: Response to comments for ORU-2/tanks permit modification

Hi Rich. Thank you for sending these. Heather is out sick today, and I'm heading home sick too, so we won't be able to fully respond until you return on Tuesday. I have some easy questions you might be able to answer in the meantime:

1. Please send us the exact wording of the permit condition.
Attached.
2. Response 1c – Is this supposed to say Tanks F-1403 through F-1416? And the sentence, "WTP-2 starts when process water is removed from the process tanks." Which process tanks does this refer to? Please tell me the tank #s.
Correct. Tanks F-1411 through F-1416 have not yet been installed. There is only one process tank (F01402). The "s" on the end is a typo.
3. On responses page 4 (re: Section 3 of SA 22) – the number of tanks is 8, correct, as stated in SA 22?
The tank list in SA 22 contains those 8 tanks that are part of the recycling process. Three of these tanks are product tanks that are not regulated under RCRA (more on these tanks below). The other five tanks are being permitted to avoid issues of their status in the event of an system shut-down lasting more than 24 hours.
4. SA 22, page 2-3 – What is SCADA?
SCADA is an acronym for the automated system that monitors and operates ORU-2.
5. SA 22 Table 22-3 – Are ME-1101 and ME-1102 the same as F-1101 and F-1102 on the diagram?
Yes.
6. SA 22 Section 6.2.2 – What is the tank #s of the mixing tank? Is it F-1101 Mixing Hopper?
Yes, and I should have called it that.
7. SA 22 Section 7.2, 4th line – Should this say Subpart BB instead of Subpart CC? Otherwise, CC does not apply to the recycling operation, right?

This section is discussing Subpart CC. When the ORU-2 is operating (recycling), CC does not apply. If the ORU-2 is shut-down, these tanks move into storage mode, when CC might apply. The subpart ff controls apply even in the recycling mode.

8. SA 23, Table 23-1 – Is F-1402 supposed to be in this table? I thought the responses said that the WWTP-2 starts with F-1403? Likewise, what's the purpose of adding the three product tanks to this table?

F-1402 is supposed to be in the table (see #3 above). Including the three product tanks is for the purposes of the closure cost estimates in anticipation of our adoption of the DSW rule next year. They are not required to include these tanks today, but the FA requirements in the DSW rules will include these tanks.

I might have more questions after I talk with Heather.

-Janette

From: DUVAL Rich [<mailto:Rich.DUVAL@state.or.us>]

Sent: Monday, July 02, 2018 2:56 PM

To: Knittel, Janette <Knittel.Janette@epa.gov>

Subject: Response to comments for ORU-2/tanks permit modification

The official pdfs of these documents won't be available today, so here are copies of the word files.